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April 14, 2022

**VIA ECF**

Honorable Gregory H. Woods  
United States District Court, SDNY  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: **Zivkovic v. Laura Christy LLC, et al, 17 CV  
553 (GHW) (GWG)**

Dear Judge Woods,

We represent Defendant, Laura Christy Midtown, LLC. in the  
above and write on behalf of all Defendants.

We remind the Court that at the close of Plaintiffs' case, we  
moved the Court to de-certify the Plaintiff class. Our motion at  
that time was grounded, inter alia, on Plaintiffs' failure in  
its case, to cure the Courts' basis for denying summary judgment  
as set forth in the Court's decision dated October 18, 2019 at  
pages 11-12. Further our said motion relied upon the holding  
of the Second Circuit Court of Appeals in Jin v. Shanghai  
Original, Inc. , 990 F.3d 251. Plaintiffs called as witnesses  
only 4 members of the almost 400 person class, did not procure  
expert testimony to establish damages and failed to adduce  
representative testimony. We submit that the said motion merits  
consideration and a decision by the Court.

Respectfully,

/S/ Leonard Spielberg